

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

MARK FLORA

§

§

Plaintiff,

§

§

VS.

§

CIVIL ACTION NO.:

§

4:19-CV-2328

TRANSOCEAN DRILLING (USA),
INC., ET AL.

§

§

Defendants.

§

**JOINT NOTICE TO THE COURT REGARDING THE SUBMISSION
DATE FOR LLOG EXPLORATION OFFSHORE, LLC'S MOTION FOR
SUMMARY JUDGMENT**

The parties file this joint notice to request that the motion docket date for LLOG Exploration Offshore, LLC's Motion for Summary Judgment be moved to October 1, 2021. The parties request that the docket date be moved to October 1, 2021 to allow additional time to take the deposition of Scott Sepulvado, which has been tentatively scheduled for September 8, 2021.¹

¹ The parties request the submission date be moved to allow Plaintiff's counsel sufficient time to take the deposition of Mr. Sepulvedo, obtain a transcript of the deposition, and respond to LLOG Exploration Offshore, LLC's motion for summary judgment.

Respectfully submitted,

MORROW & SHEPPARD LLP

/s/ Daniel E. Sheppard

John D. Sheppard

State Bar No. 24051331

Federal I.D. 635193

Daniel E. Sheppard

State Bar No. 24103929

Federal I.D. 3120079

msfiling@morrowsheppard.com

jsheppard@morrowsheppard.com

dsheppard@morrowsheppard.com

5151 San Felipe Street, Suite 100

Houston, Texas 77056

Telephone: (713) 489-1206

Facsimile: (713) 893-8370

Attorney for Plaintiff

Mark Flora

BROWN SIMS, P.C.

/s/Melanie G. Fordyce (with permission)

Michael D. Williams

State Bar No. 21564330

Federal I.D. 6982

mwilliams@brownsims.com

John G. H. Davis

State Bar No. 24012507

jdavis@brownsims.com

Melanie G. Fordyce

State Bar No. 24206702

Federal I.D. No. 1179595

mfordyce@brownsims.com

1177 West Loop South, 10th Floor

Houston, Texas 77027

Telephone: (713) 629-1580

Facsimile: (713) 629-5027

Attorneys for Defendant,

Grand Isle Shipyard, LLC

ALLEN & GOOCH A LAW
CORPORATION

/s/Alan J. Meche (with permission)

Alan J. Meche

State Bar No. 24025530

AlanMeche@AllenGooch.com

Randy Theunissen

State Bar No. 00795174

RandyTheunissen@AllenGooch.com

P. O. Box 81129

Lafayette, Louisiana 70598-1129

Telephone: (337) 291-1480

Facsimile: (337) 291-1485

*Attorneys for Defendants,
Gulf Logistics Operating, Inc. and Gulf
Logistics, LLC, and LLOG Exploration
Offshore, LLC (erroneously named as
LLOG Holdings, LLC)*

Certificate of Service

I hereby certify that on August 24, 2021, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF filing system. Notice of this filing will be sent to counsel for all parties by operation of the Court's electronic filing system.

/s/Daniel E. Sheppard

Daniel E. Sheppard

Certificate of Conference

The parties are unopposed to the relief sought.

/s/Daniel E. Sheppard

Daniel E. Sheppard